

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

VICTOR ZILBERMAN,

Plaintiff,

v.

**CAROFFER, LLC, and PEARL
TECHNOLOGY HOLDINGS, LLC,**

Defendants

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CASE NO. 4:15-CV-00589-ALM

NOTICE OF SETTLEMENT

Christopher Moser (“Trustee”), as trustee and representative of the bankruptcy estate of CarOffer, LLC (“CarOffer”), files this Notice of Settlement and seeks dismissal of claims against Pearl.

With the approval of the Bankruptcy Court of the Eastern District of Texas, Trustee, on behalf of CarOffer’s estate and creditors, reached a settlement agreement with Pearl Technology Holdings, LLC (“Pearl”) and released Pearl from liability for all asserted and non-asserted claims belonging to CarOffer’s estate. A copy of the settlement agreement is attached hereto as Exhibit A and a copy of the Bankruptcy Court’s order approving the same is attached as Exhibit B.

With respect to the instant lawsuit, *Zilberman v. CarOffer, et al.*, Trustee released Pearl from liability based on claims of derivative liability, alter ego liability, misuse of the corporate form, and/or piercing the corporate veil. Trustee asserts its exclusive control over all claims against Pearl based on alter ego and/or veil piercing liability, regardless of whether alleged by Plaintiff Victor Zilberman (“Zilberman”), CarOffer, or CarOffer’s estate. Accordingly, Trustee requests that this Court dismiss all alter ego and/or veil piercing claims that Zilberman or CarOffer pursues against Pearl in the instant action.

Dated: February 24, 2016.

Respectfully submitted,

/s/ **Richard L. Bufkin**

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CAROFFER, LLC; *In re CarOffer, LLC*, in
the United States Bankruptcy Court for
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41038**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing document was served on counsel of record via Fax, in accordance with the Federal Rules of Civil Procedure, on February 24, 2016.

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